

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

IN THE MATTER OF THE SEARCH	)	Case No. 1:19-mj-194-AJ
OF SAFE DEPOSIT [REDACTED] AT	)	
CAMBRIDGE BANK AND TRUST,	)	
20 INTERNATIONAL DRIVE,	)	
PORTSMOUTH, NEW HAMPSHIRE	)	
IN RE 2017R00336	)	

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MOTION TO EXTEND SEAL AT LEVEL II: ENTIRE MATTER  
RELATED TO APPLICATION FOR SEARCH WARRANT

In the above captioned case, the United States of America respectfully moves to extend the seal at Level II, the entire matter related to the Application for a Search Warrant, including the application, the supporting affidavit, any search warrant that may issue, the resulting return, this motion, and the corresponding docket text entries for **180 days**, expiring on **March 8, 2023**, except that the government may later disclose these materials to comply with its discovery obligations under the local rules.

Under Federal Rule of Criminal Procedure 49.1(d) and Local Rule 83.12(a)(1), the Court has authority to grant this motion.

The Court should extend the seal of these documents because they contain sensitive information, which, if prematurely released, may compromise an ongoing criminal investigation. Specifically, the application contains information identifying targets of the investigation. Investigators believe that those targets are unaware that they are considered suspects or are unaware of the incriminating evidence investigators have gathered against them. Should information identifying those targets and the evidence against them be released, it may cause them to flee, destroy evidence, or change their patterns of behavior.

Motion To Extend Seal of Entire Matter Related to Search Warrant  
Page 2 of 2

This motion is not intended to preclude the executing officer from serving a copy of the application and a receipt for any property seized as required by Federal Rule of Criminal Procedure 41(f)(1)(C).

Respectfully submitted,

JANE E. YOUNG  
United States Attorney

Dated: September 9, 2022

By: /s/ Jarad E. Hodes  
Jarad E. Hodes  
Assistant United States Attorney